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Counsel for GRCDallasHomes LLC

United States Bankruptcy Court
Eastern District of Texas
Sherman Division

GRCDallasHomes LLC,

Debtor.

Case No. 19-41186

Chapter 11

Judge Brenda T. Rhoades

NORRED LAW, PLLC'S MOTION TO WITHDRAW AS ATTORNEY IN CHARGE

Your rights may be affected by the relief sought in this pleading. You should read this pleading carefully and discuss it with your attorney if you have one in this bankruptcy case. If you oppose the relief sought by this pleading, you must file a written objection, explaining the factual and/or legal basis for opposing the relief.

No hearing will be conducted on this Motion unless a written objection is filed with the Clerk of the United States Bankruptcy Court and served upon the party filing this pleading WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE shown in the certificate of service unless the Court shortens or extends the time for filing such objection. If no objection is timely served and filed, this pleading shall be deemed to be unopposed, and the Court may enter an order granting the relief sought. If an objection is filed and served in a timely manner, the Court will thereafter set a hearing with appropriate notice. If you fail to appear at the hearing, your objection may be stricken. The Court reserves the right to set a hearing on any matter.

Clayton L. Everett and Warren V. Norred file this motion requesting permission from the Court to withdraw as attorneys for GRCDallasHomes, LLC ("GRC").

1. There is good cause for this Court to grant the motion to withdraw because there has been a breakdown of the attorney-client relationship and continued representation has been rendered unreasonably difficult by the GRC.

2. The undersigned counsel has made numerous attempts to reach GRC's principal agent, Mr. Daneshmandi, via phone, text message, email, regular mail, and through his business associates. None of the phone calls, emails, or text messages have been returned.
3. The undersigned counsel has been unable to communicate with Mr. Daneshmandi since October 11, 2022.
4. Absent communication with Mr. Daneshmandi, the undersigned counsel cannot adequately represent the interest of GRC in these proceedings.
5. For these reasons, Clayton L. Everett and Warren V. Norred ask this Court to grant their motion to withdraw.

Dated: November 2, 2022.

Respectfully submitted:

/s/ Clayton L. Everett
Clayton L. Everett, Texas Bar No. 24065212
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Attorney for GRCDALLASHOMES LLC

Certificate of Service

I hereby certify that on November 2, 2022, a true and correct copy of the above notice has been served via electronic means to all those receiving notice thereof and by Regular and Certified Mail upon the following:

Kazem Daneshmandi
4430 Chapman
The Colony, TX 75056
and
13220 Beach Club Rd
The Colony, TX 75056

Touba Daneshmandi
4430 Chapman
The Colony, TX 75056
and
13220 Beach Club Rd
The Colony, TX 75056

/s/ Clayton L. Everett